

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS

EVA VILLANUEVA CARREON  
*Plaintiff,*

V.

SONIA GONZALES GAMEZ D/B/A  
TRANSPORTES RIGONZA  
*Defendant,*

§  
§  
§  
§  
§  
§  
§

CIVIL ACTION NO. 5-19-cv-124  
Jury Trial Demanded

**AGREED MOTION FOR ENTRY OF FINAL JUDGMENT**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Eva Villanueva Carreon (Hereinafter “Plaintiff”) and Sonia Gonzales Gamez D/B/A Transportes Rigonza (Hereinafter “Defendant”) parties in the above-entitled and numbered cause of action (Hereinafter “The Parties”) and files agreed motion for entry of final judgment and in support of the motion shows this Honorable Court as follows:

**I.**

1. On March 30, 2022, this case was submitted to a jury. The jury’s verdict was returned in open court in favor of Plaintiff with all the necessary jury questions answered.
2. The Parties request entry of a judgment stating that Plaintiff Eva Villanueva Carreon (“Plaintiff”) take Eighty Thousand and xx/00 (\$80,000) against Defendants, and that Plaintiffs be awarded court costs as allowed by law. A copy of the proposed Final Judgment on Jury Verdict is attached as Exhibit “A”.

**II. PRAYER**

For these reasons, the Parties ask the Court to enter a judgment that Plaintiffs take Eighty Thousand and xx/00 (\$80,000) against Defendants, that Plaintiffs be awarded court costs as allowed by law, and for such other relief to which Defendants may be entitled.

Respectfully Submitted,

**DONATO BROWN POOL & MOEHLMANN**

/s/ Chaz D. Klaes

Chaz D. Klaes

State Bar No.: 24083312

S.D. Texas Federal ID No.: 1760067

William E. "Cal" Calvert, II,

State Bar No.: 24045605

Southern District Bar No. 570837

3200 Southwest Freeway, Suite 2300

Houston, Texas 77027

Telephone: (713) 877-1112

Facsimile: (713) 877-1138

E-mail: cklaes@donatobrown.com

E-Mail: wcalvert@donatobrown.com

**ATTORNEYS FOR DEFENDANT**

And

Cowen | Rodriguez | Peacock, P.C.

/s/ Michael Cowen

Attorney-In-Charge

Texas Bar No. 00795306

Cowen | Rodriguez | Peacock, P.C.

6243 IH-10 West, Suite 801

San Antonio, Texas 78201

Telephone: (210) 941-1301

Facsimile: (210) 579-8968

E-Mail for Service: efilings@cowenlaw.com

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that, on the 18<sup>th</sup> day of April 2022, a true and correct copy of the above and foregoing has been served by:

☐ certified mail, return receipt requested; ☐ overnight delivery; ☐ hand delivery;  
☐ United States first class mail; ☐ facsimile transmission; ☒ electronic  
transmission on the following counsel:

**Counsel for Plaintiff**

Malorie J. Peacock  
Michael R. Cowen  
Cowen Rodriguez Peacock  
San Antonio, Texas 78201  
T: (210) 941-1301  
F: (210) 579-8968  
efilings@cowenlaw.com

/s/ Chaz D. Klaes

Chaz Klaes